

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

United States of America

v.

Crystal Hardy

1:19-cr-00250-PB-1

**MOTION TO SUPPRESS**

The Defendant, through counsel, John P. Newman, Esq., hereby moves to suppress evidence in the above-captioned case.

In support, it is stated:

1. The United States has charged the Defendant with 21 U.S.C. 841(a)(1) and 846:  
Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance.
2. The charges arise from an initial search of the defendant's vehicle after a traffic stop.
3. The evidence obtained in the initial search was used to obtain statements from Ms.  
Hardy as well a search warrant.
4. Further evidence was obtained upon execution of the warrant.
5. The defendant moves to suppress the evidence obtained in the initial search,  
statements made by the Defendant after the initial search, and the evidence obtained  
pursuant to the warrant, as the statements and the second search are the fruits of the  
initial illegal search
6. The defendant requests an evidentiary hearing.
7. A Memorandum of Law is attached.
8. The United States objects to the relief sought herein.

WHEREFORE, the defendant respectfully requests that this Court:

- a. Grant the within Motion;

- b. Schedule an evidentiary hearing;
- c. Suppress all evidence seized from the defendant's vehicle on or about April 5-6, 2019;
- d. Suppress all statements made by the Defendant on April 5, 2019 in relation to the items found in her vehicle; and,
- e. Grant such relief as the Court deems necessary, just and fair.

Respectfully submitted,

/s/ John P. Newman  
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion has been forwarded by electronic mail through the ECF system on January 12, 2021 to Debra M. Walsh, Esq., and to Patrick Richard, Esq., counsel for the codefendant, Christopher Kelly.

/s/ John P. Newman  
John P. Newman